

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

## Application Review

**Issue Date: DRAFT**

**Region:** Winston-Salem Regional Office  
**County:** Wilkes  
**NC Facility ID:** 9700023  
**Inspector's Name:** Robert Barker  
**Date of Last Inspection:** 12/07/2015  
**Compliance Code:** 3 / Compliance - inspection

<p style="text-align: center;"><b>Facility Data</b></p> <p><b>Applicant (Facility's Name):</b> Gardner Glass Products, Inc.</p> <p><b>Facility Address:</b>  Gardner Glass Products, Inc.  301 Elkin Highway  North Wilkesboro, NC 28659</p> <p><b>SIC:</b> 3231 / Products Of Purchased Glass  <b>NAICS:</b> 327215 / Glass Product Manufacturing Made of Purchased Glass</p> <p><b>Facility Classification: Before:</b> Title V <b>After:</b> Title V  <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V</p>	<p style="text-align: center;"><b>Permit Applicability (this application only)</b></p> <p><b>SIP:</b> 15A NCAC 02Q .0513  <b>NSPS:</b> N/A  <b>NESHAP:</b> N/A  <b>PSD:</b> N/A  <b>PSD Avoidance:</b> N/A  <b>NC Toxics:</b> N/A  <b>112(r):</b> N/A  <b>Other:</b> N/A</p>
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Contact Data			Application Data
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	
Jill Edwards Environmental Manager (336) 566-9803 PO Box 1570 North Wilkesboro, NC 28659	Roger Miller Vice President of Manufacturing (336) 428-7044 PO Box 1570 North Wilkesboro, NC 28659+1570	Jill Edwards Environmental Manager (336) 566-9803 PO Box 1570 North Wilkesboro, NC 28659	<p><b>Application Number:</b> 9700023.16A  <b>Date Received:</b> 02/01/2016  <b>Application Type:</b> Renewal  <b>Application Schedule:</b> TV-Renewal</p> <p style="text-align: center;"><b>Existing Permit Data</b></p> <p><b>Existing Permit Number:</b> 02207/T09  <b>Existing Permit Issue Date:</b> 11/28/2011  <b>Existing Permit Expiration Date:</b> 10/31/2016</p>

Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2015	---	0.2000	68.46	0.1700	0.0100	0.6970	0.6933 [Xylene (mixed isomers)]
2014	---	0.1900	78.79	0.1500	0.0100	0.6307	0.6273 [Xylene (mixed isomers)]
2013	---	0.1400	60.78	0.1200	0.0100	0.5998	0.5972 [Xylene (mixed isomers)]
2012	---	---	56.63	---	---	0.2318	0.2316 [Xylene (mixed isomers)]
2011	---	0.1400	46.68	0.1200	0.0100	0.9439	0.9438 [Xylene (mixed isomers)]

<p><b>Review Engineer:</b> Kevin Godwin</p> <p><b>Review Engineer's Signature:</b> _____ <b>Date:</b> _____</p>	<p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p><b>Issue</b> 02207/T10  <b>Permit Issue Date:</b> DRAFT  <b>Permit Expiration Date:</b> DRAFT</p>
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## **I. Introduction**

- A. According to the renewal application, Gardner Glass Products, Inc. manufactures mirrors and color-coated glass products. The existing permit covers sources including:

a curtain coater mirror backing line (ID No. CC1), a color glass coating line consisting of a curtain coater (ID No. CG1), and two electric drying ovens.

Additionally, there are a number of insignificant activities, including:

a natural gas-fired process water heater (2.5 million Btu per hour heat input, ID No. IPWH1), two ink jet printers (ID Nos. IP1 and IP2), five internally vented natural gas-fired space heaters (0.15 million Btu per hour heat input, ID Nos. ISH1 through ISH5), one natural gas-fired boiler (2.35 million Btu per hour heat input, ID No. IB2), and direct to glass painting (ID No. I-DTG).

- B. The application to renew the existing Title V air quality permit was postmarked January 29, 2016 or within nine months prior to permit expiration, and is currently covered by the application shield provided in 15A NCAC 02Q .0512.
- C. The Permittee has not proposed any changes to the existing Title V operating permit as part of the renewal process. The permit has not been modified since the last permit renewal was issued on November 28, 2011.

## **II. Changes to Existing Title V Air Permit**

The following table provides a summary of changes made with this permit revision 04379T43.

<b>Page No.</b>	<b>Section</b>	<b>Description of Change</b>
Cover letter	N/A	Amended application type; permit revision numbers, dates and included updated letterhead.
1	Permit cover page	Amended permit revision numbers and all dates.
N/A	All, Header	Updated permit revision number.
3	2.1 A.	Removed applicability of 15A NCAC 02D .0958.
5	2.1 A.4.	Removed specific condition pertaining to 15A NCAC 02D .0958.
Global	Global	Replaced the word assure with ensure throughout permit, except General Conditions.
7	3	Updated General Conditions to latest shell version (v4.0).

## **III. Statement of Compliance**

DAQ has reviewed the facility's compliance status. The facility was last inspected on December 7, 2015 by Mr. Robert Barker of the Winston-Salem Regional Office (WSRO). According to the inspection report, the facility appeared to be operating in full compliance with all applicable requirements. Regarding the 5-year compliance history, the report notes that a Notice of Deficiency (NOD) was issued on February 12, 2014 for a late semi-annual report.

## **IV. Review of Applicable Regulations**

- A. One curtain coater mirror backing line (ID No. CC1)  
One curtain coater for glass painting (ID No. CG1)

### **1. Applicable Regulatory Requirements**

- 15A NCAC 02D .0515,
- 15A NCAC 02D .0521,
- 15A NCAC 02D 1806,
- 15A NCAC 02Q .0317, for avoidance of 02D .0530 "Prevention of Significant Deterioration"
- 15A NCAC 02Q .0711

2. According to the application, two roll coaters (ID Nos. CG2.1 and CG2.2) have been removed from the facility and no longer require permitting.

#### **V. Compliance Assurance Monitoring (CAM)**

Pursuant to 40 CFR 64.2, the provisions of the CAM rule are applicable to emission units that meet all of the following criteria:

1. The unit is subject to an emissions limitation AND uses a control device to achieve compliance with the limit;
2. The unit has pre-control potential emissions that are equal to or greater than 100% of the amount (in tpy) required for a source to be classified as a major source; and
3. The unit is not exempt under 40 CFR 64.2(b).

Because the facility does not use any control devices, CAM does not apply.

#### **VI. Maximum Achievable Control Technology (MACT) Applicability**

The facility is considered a minor source of HAP emissions and not subject to any MACT standards at this time.

#### **VII. Prevention of Significant Deterioration (PSD)**

In order to be classified as a minor stationary source with regards to PSD, the existing permit includes an avoidance condition limiting VOC emissions to less than 250 tons per year. Monitoring and recordkeeping are required. No changes are necessary. The existing condition is carried over to the renewed permit. According to the inspection report, from December 2014 through November 2015, the facility emitted 75.67 tons of VOC.

#### **VIII. New Source Performance Standards (NSPS)**

No sources at this facility are subject to NSPS.

#### **IX. Toxic Air Pollutant (TAP) Procedures**

The existing permit includes a condition referencing the requirements listed in 15A NCAC 02Q .0711 "Emission Rates Requiring a Permit." This regulation requires the facility to be operated and maintained in such a manner that TAP emissions do not exceed the toxic permit emission rates (TPER). The existing condition is carried over to the renewed permit. According to the inspection report, compliance is indicated.

#### **X. Insignificant Activities**

The existing permit includes a list of insignificant activities under 15A NCAC 02Q .0503(8). DAQ has confirmed that maximum emissions from these sources are less than 5 tpy of all regulated criteria pollutants and less than 1,000 lb/year HAP. No new applicable regulations apply to these sources as part of the Title V permit renewal. No other regulatory review is required at this time.

#### **XI. Permitting History Since Issuance of Title V Permit Renewal**

The Permit has not been modified since the last permit renewal. According to the inspection report, two permit applicability determinations (AD) were requested.

- AD No. 2023 involved adding a second spray booth to the direct to glass painting area (ID No. I-DTG). DAQ response was that no permit modification was required.
- AD No. 2496 involved adding an automated spray system to I-DTG. DAQ response was that a notification was not required and the facility could implement the change immediately.

#### **XII. Other Regulatory Considerations**

- An application fee is not required for this renewal application.
- A zoning consistency determination is not required for this renewal application.
- A Professional Engineer's Seal is not required for this renewal application.
- DAQ Title V Equipment Editor (TVEE) database update was approved on March 31, 2017.

### **XIII. Draft/Proposed Permit Review Summary**

- Mr. Robert Barker, (WSRO) was provided a draft permit for review on March 31, 2017. WSRO responded on April 3, 2017 with minor comments. All comments were addressed.
- Ms. Jill Edwards (Gardner Glass) was provided a draft permit for review on March 31, 2017. Gardner Glass responded on XXXX with XXXX comments. All comments were addressed.
- NCDAQ published a Public Notice of the proposed Title V permit renewal on XXXX on DAQ website. The public comment period expired on XXXX with no comments received.
- U.S. EPA Region IV was provided a draft permit for review on XXXX. EPA comment period expired on XXXX with no comments received.

### **XIV. Recommendations**

This Title V Permit Renewal for Gardner Glass Products, Inc., Wilkes County, North Carolina has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility appears to be complying or is expected to achieve compliance as specified in the permit with all applicable requirements. DAQ recommends issuance of the permit renewal.